

Thomas R. Johnson, OSB #010645  
Tom.Johnson@stoel.com  
Alex Van Rysselberghe, OSB #174836  
Alex.VanRysselberghe@stoel.com  
STOEL RIVES LLP  
760 SW Ninth Avenue, Suite 3000  
Portland, OR 97205  
Telephone: 503.224.3380  
Facsimile: 503.220.2480

Eric J. Neiman, OSB #823513  
Eric.Neiman@lewisbrisbois.com  
Emma P. Pelkey, OSB #144029  
Emma.Pelkey@lewisbrisbois.com  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
888 SW Fifth Avenue, Suite 900  
Portland, Oregon 97204-2025  
Telephone: 971.712.2800

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

DISABILITY RIGHTS OREGON;  
METROPOLITAN PUBLIC DEFENDERS  
INCORPORATED; and A.J. MADISON,

Plaintiffs,

v.

PATRICK ALLEN, in his official capacity as  
Director of Oregon Health Authority; and  
DOLORES MATTEUCCI, in her official  
capacity as Superintendent of the Oregon State  
Hospital,

Defendants,

and

LEGACY EMANUEL HOSPITAL &  
HEALTH CENTER d/b/a UNITY CENTER  
FOR BEHAVIORAL HEALTH; LEGACY

Case No.: 3:02-cv-00339-MO (Lead Case)

**DECLARATION OF ALEX VAN  
RYSSELBERGHE IN SUPPORT OF  
PLAINTIFFS LEGACY EMANUEL  
HOSPITAL & HEALTH CENTER D/B/A  
UNITY CENTER FOR BEHAVIORAL  
HEALTH, LEGACY HEALTH SYSTEM,  
PEACEHEALTH, PROVIDENCE  
HEALTH & SERVICES – OREGON, AND  
ST. CHARLES HEALTH SYSTEM’S  
MOTION FOR RECONSIDERATION OF  
THE MAY 25, 2023 OPINION AND  
ORDER AND TO VACATE THE MAY 30,  
2023 JUDGMENT**

ORAL ARGUMENT REQUESTED

HEALTH SYSTEM; PEACEHEALTH; and  
PROVIDENCE HEALTH & SERVICES –  
OREGON,

Intervenors.

JAROD BOWMAN; and JOSHAWN  
DOUGLAS SIMPSON,

Plaintiffs,

v.

DOLORES MATTEUCCI, Superintendent of  
the Oregon State Hospital, in her individual and  
official capacity; PATRICK ALLEN, Director  
of the Oregon Health Authority, in his  
individual and official capacity,

Defendants,

and

LEGACY EMANUEL HOSPITAL &  
HEALTH CENTER d/b/a UNITY CENTER  
FOR BEHAVIORAL HEALTH; LEGACY  
HEALTH SYSTEM; PEACEHEALTH; and  
PROVIDENCE HEALTH & SERVICES –  
OREGON,

Intervenors.

Case No.: 3:21-cv-01637-MO (Member Case)

LEGACY EMANUEL HOSPITAL &  
HEALTH CENTER d/b/a UNITY CENTER  
FOR BEHAVIORAL HEALTH; LEGACY  
HEALTH SYSTEM; PEACEHEALTH;  
PROVIDENCE HEALTH & SERVICES –  
OREGON; and ST. CHARLES HEALTH  
SYSTEM,

Plaintiffs,

v.

PATRICK ALLEN, in his official capacity as  
Director of Oregon Health Authority,

Defendant.

Case No.: 6:22-cv-01460-MO (Member Case)

I, Alex Van Rysselberghe, declare as follows:

1. I am an associate attorney at Stoel Rives LLP, and I am one of the attorneys representing Plaintiffs Legacy Emanuel Hospital & Health Center d/b/a Unity Center for Behavioral Health, Legacy Health System, PeaceHealth, Providence Health & Services – Oregon, and St. Charles Health System (“Plaintiffs”) in this action. I am competent to testify about the matters set forth herein and make this declaration based on my personal knowledge. I submit this declaration in support of Plaintiff’s Motion for Reconsideration of the May 25, 2023 Opinion and Order and to Vacate the May 30, 2023 Judgment.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Second Amended Complaint.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Second Amended Complaint, with redlines.

I hereby declare that the above statement is true and correct to the best of my knowledge and belief and that I understand it is made for use as evidence in court and subject to penalty for perjury.

DATED: June 26, 2023

Respectfully submitted,

STOEL RIVES LLP

/s/ Alex Van Rysselberghe

Thomas R. Johnson, OSB #010645

tom.johnson@stoel.com

Alex Van Rysselberghe, OSB #174836

alex.vanrysselberghe@stoel.com

*Attorneys for Plaintiffs*